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Ellen K. Wolf
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Shaghal, Ltd.

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

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In re:

SEARS HOLDINGS CORPORATION, et al.,

Chapter 11

Debtor.

Case No. 18-23538 (RDD)

(Jointly Administered)

MOTION FOR WITHDRAWAL AS ATTORNEY OF RECORD

TO THE HONORABLE COURT:

Ellen K. Wolf and the law firm of Wolf Wallenstein, PC hereby move for an order permitting the undersigned counsel to withdraw her appearance as counsel of record for SHAGHAL, LTD in the above captioned bankruptcy cases pursuant to Rule 2090-1(e) of the Local Bankruptcy Rules for the Southern District of New York, and in support thereto state and pray as follows:

1. The undersigned counsel certifies that Shaghal, Ltd. has requested her withdrawal as counsel of record in this case.

2. Since early March, 2021, Jerry Kaplan, a partner with the firm of Kaplan, Kenegos & Kadin, located at 9150 Wilshire Blvd, Suite 175, Beverly Hills, CA 90212 (Phone: (310) 859-7700; Fax: (310) 859-7773), has been negotiating with counsel for Debtor and Trustee in this matter on behalf of Creditor Shaghal, Ltd.

3. Since March 12, 2021 Jeremy Rosenberg, an attorney with the firm of Kaplan, Kenegos & Kadin, has represented to Wolf Wallenstein, PC that an attorney from Kaplan, Kenegos & Kadin would apply for Pro Hac Vice admission and, per Shaghal, Ltd.'s request, would represent the company in this proceeding.

4. Mr. Rosenberg re-affirmed this intention on April 23, 2021 in a phone call with my office staff.

5. Therefore, the undersigned counsel respectfully requests this Court enter an order granting leave to withdraw her legal representation on behalf of Shaghal, Ltd.

WHEREFORE, the undersigned counsel pray the Court enter an order, substantially in the form attached hereto as Exhibit 1, granting her withdrawal as attorney of record for Shaghal, Ltd. in the captioned case.

DATED: May 17, 2021

Los Angeles, CA

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By: /s/ Ellen K. Wolf
Ellen Kaufman Wolf